

## **Conducting Internal EMS and Compliance Status Audits**

### **I. PURPOSE**

This procedure specifies the requirements for performing Internal EMS Audits at EPA Region 9. These audits are a part of the EPA Region 9 EMS and are conducted periodically to ascertain that the EMS is properly implemented and continues to conform to planned arrangements for environmental management, including the requirements of Executive Order 13148 and ISO-14001. These audits can also help determine the regulatory status of the EPA Pacific Southwest office at the time of the audit.

### **II. SCOPE**

During each twelve-month period, internal EMS audits cover the requirements of the ISO-14001 standard as well as EPA Region 9's EMS. All parts of the organization covered by the EMS are legitimate areas for internal EMS audits.

### **III. GENERAL INFORMATION**

Specific guidance and templates for conducting an internal audit is available on the EMS Lotus Notes database.

Definitions:

**Internal EMS Audit:** A periodic audit of the EMS to verify that it is properly implemented and that it continues to conform to planned arrangements for environmental management. It is an audit of the system and findings are expressed as non-conformances or opportunities for improvement. Audit conclusions are based on the findings and focus on the root causes that led to the non-conformances.

**Audit Finding:** Any deviation from procedures or requirements of the standard is defined as an audit finding. Findings are categorized into three categories defined as follows:

**Major Non-conformance:** One or more numbered requirements of ISO 14001 have not been addressed or have not been implemented; or several similar minor nonconformities in documentation and/or implementation, taken together, lead a reasonable auditor to conclude that one or more numbered requirements of ISO 14001 have not been addressed or implemented.

**Minor Non-conformances:** One or a single observed nonconformance to the EMS standard or the Company's EMS, not considered to be a breakdown in the Company's EMS.

**Opportunity for Improvement:** An opportunity for improvement relates to a matter about which the Auditor is concerned but which cannot be clearly stated as a non-conformity. Observations also indicate trends which may result in a future non-conformity.

**Lead Auditor:** The person responsible for leading the audit.

**Audit Plan:** A written plan for conducting the audit.

**Audit Criteria:** Audit criteria consist of questions and tests based upon the specified arrangements for the EMS and are designed to elicit evidence of conformity with ISO-14001 and provisions of EPA Region 9's EMS.

**Compliance Audit:** A periodic audit of compliance to regulatory and other requirements that are imposed on the organization. Findings are expressed as non-compliances. The search for root causes in a typical compliance audit is not as intense as it should be during an EMS audit.

Internal audits are scheduled not less than annually. An individual audit may be limited to a sampling of EMS elements or specific areas in EPA Region 9, and can be both random and/or focused on certain activities based on their importance and/or results of previous audits.

The EMS Lead is responsible for creating and managing the Audit Program. He or she is also responsible for selecting the lead auditor for a given audit. The designated lead auditor is responsible for selecting the audit team and ensuring that the audit team conducts and completes the audit as planned.

#### IV. APPROACH

1. Each audit requires an audit plan that is prepared by the lead auditor for that audit. The audit plan addresses the following preparatory matters:
  - Audit scope and objectives,
  - Audit criteria to be applied,
  - Audit dates, times and other logistics,
  - Protocol for conducting the audit (e.g., interviews, access, coordination, safety, resolution of findings),
2. Internal EMS audit requirements include the following: The lead auditor must receive auditor training. EMS audits are conducted against pre-established audit criteria. The audit criteria are developed jointly by the EMS Lead and the lead auditor. Audit criteria consist of questions and tests based upon the specified arrangements for the EMS and are

designed to elicit evidence of conformity with ISO-14001 and EPA Region 9's EMS. The focus of the EMS audit is to ascertain that the EMS has been effectively implemented and is functioning in accordance with established arrangements. Audit findings must be based on objective evidence that is properly corroborated and authenticated. (Auditors should avoid reaching conclusions on the basis of hearsay or opinion.)

3. On-site audit process: EMS audits are conducted primarily through document review and interviews with personnel. EMS auditors may also do sampling. The EMS auditors may also rely on records for information related to the functioning of the EMS and its objectives and targets. The EMS auditors may also rely on observations of operating conditions to gauge environmental status and conditions if that is appropriate and efficacious. The lead auditor conducts opening and closing meetings with the EMS Lead. The lead auditor documents corrective actions. Responsibility for corrective actions resides with the SEA Lead in the area where the findings occurred. If a corrective action relates to the EMS itself, the EMS Lead will have primary responsibility to make the correction. The EMS Lead and/or lead auditor ensures that corrective and preventive actions are completed. The process for corrective and preventive actions is the same for findings during the EMS audit as it is for findings that may be detected from time to time in the EMS.
4. When the audit is complete, the audit lead completes the audit report and makes it available to the EMS Lead. The EMS Lead prepares the Corrective Action Report (CAR). The EMS Lead, or appropriate SEA Lead, after conferring with the EMS Lead, addresses findings, by developing corrective and preventive actions and determining whether there are any findings that need to be reported to senior management.
5. The EMS audit is closed when the audit lead and / or EMS Lead establishes that the corrective and preventive actions have been accomplished. The EMS Lead is responsible for verifying that each corrective and preventive action is completed.
6. The Audit Report and actions taken to address findings are inputs to the Management Review.
7. The status of regulatory compliance of the EPA Pacific Southwest office is determined based on the results of the annual EMS audit , and the annual review of the "Legal & Other Requirements" table (SP-LR). The EMS Lead is responsible for ensuring evaluation of compliance with requirements from the "Legal & Other Requirements" table. Data and records generated in the EMS to track the achievement of objectives and targets may also be valuable in determining the compliance status of the facility.

## V. RECORDS

Records generated by this procedure include:

1. The audit plan for each audit
2. Audit criteria for each audit
3. Audit report
4. Completion of corrective and preventive actions

## VI. Revision History

Originally written October 2003; Revised June 2004, November 2004, October 2006,  
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